

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CAITLIN O’CONNOR,	)	
	)	Case No. 3:20-cv-00628
Plaintiff,	)	
	)	District Judge Richardson
v.	)	
	)	Magistrate Judge Frensley
THE LAMPO GROUP, LLC,	)	
	)	Jury Demand
Defendant.	)	

**DEFENDANT’S UNOPPOSED MOTION TO ENTER CONFIDENTIALITY ORDER**

Defendant, The Lampo Group, LLC, by and through the undersigned counsel and pursuant to Rule 26 of the Federal Rules of Civil Procedure, moves the Court to enter the attached Confidentiality Order. In support of this motion, Defendant states as follows:

1. This is a wrongful termination case.
2. Plaintiff alleges that Defendant terminated her employment in violation of the Tennessee Human Rights Act, Tennessee Disability Act, Tennessee Maternity Leave Act, and Family and Medical Leave Act.
3. Defendant contends that Plaintiff’s employment was terminated for premarital sex, which Defendant considers to be inconsistent with its Core Values.
4. This case will involve discovery of sensitive information, like the circumstances surrounding Defendant’s termination of Plaintiff’s employment, the circumstances surrounding Defendant’s discipline of similarly situated employees for the same reason, and information regarding maternity leave taken by similarly situated employees.
5. Defendant also recognizes that Plaintiff is seeking damages in this case for emotional pain, suffering, professional and personal embarrassment, humiliation, loss of enjoyment

of life, and inconvenience, which will require discovery into additional facets of Plaintiff's personal life, like her protected health information.

6. This Confidentiality Order will safeguard this sensitive information, allowing the parties to more efficiently complete discovery and resolve this case.
7. The parties have conferred regarding this motion, through counsel, and Plaintiff does not oppose it.

Respectfully submitted,

/s/Daniel Crowell

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**CERTIFICATE OF SERVICE**

I certify that, on January 19, 2021, I caused a copy of the foregoing document to be filed through the Court's CM/ECF system, which will automatically notify and send a copy of the document to:

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